



May 8, 2023

Shannon L. Watson  
Designated Federal Office, WOTAB  
Federal Motor Carrier Safety Administration (FMCSA)  
1200 New Jersey Avenue SE  
Washington, D.C. 20590  
*Submitted via email to [wotab@dot.gov](mailto:wotab@dot.gov)*

Re: Public Comments for Women of Trucking Advisory Board (WOTAB) Public Meeting  
(Docket No. FMCSA-2022-0209)

Dear Ms. Watson:

I am writing on behalf of [Futures Without Violence](#) (FUTURES), to submit a public comment for the Federal Motor Carrier Safety Administration's (FMCSA) Women in Trucking Advisory Board (WOTAB) Meeting taking place on May 16, 2023. We are writing to submit a public comment on the recently released "Crime Prevention for Truckers Study" (FMCSA-RRT-22-002). We are concerned that certain recommendations in the report may lead to policies that don't support best practices for addressing crime prevention and, in particular, sexual harassment and violence.

FUTURES is a national nonprofit organization that has worked for more than 35 years to prevent and end interpersonal and family violence in the United States (U.S.) and worldwide. We educate about and work to eliminate gender-based violence and harassment (GBVH) including domestic violence, sexual assault, stalking, sexual harassment, and human trafficking, as well as violence against children. With education and prevention campaigns, training, and technical assistance to state agencies, public and private entities, workplaces, court systems, colleges and universities, and global organizations, we advance promising policies and practices at the state and federal levels that prevent violence and help survivors and workers heal and thrive. FUTURES also leads [Workplaces Respond, the National Resource Center on Domestic and Sexual Violence](#) (Workplaces Respond), created through the Violence Against Women Act. Workplaces Respond provides resources, training, and technical assistance to employers, survivors, coworkers, and advocates to prevent and respond to domestic violence, sexual harassment and violence, and stalking impacting the workplace.

Overall, we found this study to be concerning and inconsistent with best practices related to violence prevention or sexual harassment. For the purposes of this comment, we are solely focusing on our concerns related to specific aspects of the recommendation section of the study and how these recommendations could be improved based on widely available best practices.

Section 6.2 of the study contains recommendations based on the survey participants' suggestions. Within this section, we found two worrisome elements. First, we find the recommendation that

drivers be allowed to carry firearms troubling and not in line with crime prevention best practices. Second, there is a troubling lack of acknowledgment within the recommendations related to sexual harassment in the workplace. Below we have detailed both our concerns with these two elements as well as how this might be addressed in future surveys.

One of the primary recommendations within this section suggests that truck drivers should be allowed to carry firearms, which is prohibited by the majority of trucking companies. As an anti-violence organization with roots in gender-based violence and harassment, we strongly disagree with this assessment. Allowing truck drivers to carry firearms would be a dangerous and deadly outcome of this study. According to the Centers for Disease Control (CDC), more Americans died from gun-related injuries in 2021 than any other year on record.<sup>1</sup> This recommendation doesn't account in any way for how truck drivers could be harmed or killed by carrying a firearm. Based on the survey results, many drivers experience violence from drivers within their own companies or at another company. Adding the ability to carry a firearm as a driver would likely increase the violence truck drivers experienced at the hand of other drivers. As this recommendation was based solely on optional survey respondent feedback, we would suggest having clearer questions related to mitigating workplace risk factors, safety planning, and violence prevention in future surveys. Most importantly, please do not recommend that drivers carry firearms given that they are far more likely to be used in a way that will harm the driver than protect them from harm.

A second area of concern related to Section 6.2 is a complete lack of recommendations related to sexual harassment experienced in the trucking industry. Outside of encouraging trucking companies to have a clear policy against harassment, there is no other mention of how to combat sexual harassment in the recommendations section. That is a troublesome outcome as the study itself showed statistically significant data related to women truck drivers and harassment. According to the study, "Women truck drivers were found to be 2 to 4 times more likely to report being touched without permission compared to non-minority males. Minority women were up to 9 times more likely to report being physically harmed compared to non-minority men. Similarly, non-minority women are 2 to 6 times as likely than non-minority males to be touched without permission."<sup>2</sup> Additionally, the study found that half of the harassment that occurs in the trucking industry goes unreported. Therefore, the study itself shows statistically significant data related to the high rates of harassment experienced by women drivers and the lack of reporting of harassment, but the recommendations provide nothing related to creating better reporting mechanisms, sexual harassment training, or requiring all trucking companies have a company policy related to harassment. They only encourage companies to have a harassment policy.

For future surveys, we ask the Advisory Board, and FMCSA more broadly, to consider questions related to mechanisms for reporting harassment, sexual harassment workplace trainings, sexual harassment workplace policies, and workplace cultures that may perpetuate violence and harassment.

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<sup>1</sup> Gramlich, John, "What the Data Says about Gun Deaths in the U.S." Pew Research Center, April 26, 2023. <https://www.pewresearch.org/short-reads/2023/04/26/what-the-data-says-about-gun-deaths-in-the-u-s/>.

<sup>2</sup> Filmon Habtemichael, Alessandra Egro, Bob Krile, and Matt Austin, "Crime Prevention for Truckers Study" Federal Motor Carrier Safety Administration, November 2022. <https://rosap.nhtl.bts.gov/view/dot/64915>.

When considering sexual harassment policies or recommendations for truck drivers, the Equal Employment Opportunity Commission (EEOC) has highlighted five core principles that are effective for workplace interventions related to sexual harassment.<sup>3</sup> Those principles are:

- (1) Leadership that is committed to creating and maintaining a culture where harassment is not tolerated;
- (2) Consistent and demonstrated accountability from leaders related to harassment or misconduct;
- (3) A comprehensive and clear harassment policy that is regularly communicated to all employees;
- (4) An effective and clear complaint system that operates promptly; and
- (5) Regular, interactive, and comprehensive sexual harassment trainings for all employees.

Additionally, Futures Without Violence recommends that any workplace sexual harassment training be industry specific, involve both workers and supervisors in the creation and dissemination, and demonstrate an organization-wide commitment to culture change and violence prevention.

Thank you for the opportunity to submit a public comment on this important matter. Please contact us with any questions related to statements made within this public comment at [kstewart@futureswithoutviolence.org](mailto:kstewart@futureswithoutviolence.org) or [kmiceli@futureswithoutviolence.org](mailto:kmiceli@futureswithoutviolence.org).

Respectfully submitted,

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Kate Miceli  
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<sup>3</sup> “Promising Practices for Preventing Harassment” Equal Opportunity Employment Commission, November 21, 2017. <https://www.eeoc.gov/laws/guidance/promising-practices-preventing-harassment>.